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July 19, 2017

VIA ECF

Honorable Colleen McMahon
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *United States v. Connolly, et al.*, No. 16-cr-00370

Dear Chief Judge McMahon:

Pursuant to Your Honor's Individual Rule I.D, Defendant Gavin Black respectfully submits this letter motion on behalf of both Defendants to request a one-week extension of the pre-trial motions due today. Defendants seek this adjournment in light of the Second Circuit's 81-page decision in *United States v. Allen*, which was issued this morning and is attached hereto as Exhibit A. This decision represents the Second Circuit's first statement concerning LIBOR in a criminal matter, and Defendants need to take it into account in filing their motions.

The Government does not oppose this request. The Government has proposed August 25, 2017 as the deadline for its responses, and September 8, 2017 as the deadline for Defendants' replies. Defendants agree to that schedule.

This is the Defendant's third request for an adjournment of this deadline, which originally was June 23, 2017. The Court granted the prior two requests. The requested adjournment does not affect any other scheduled dates.

Attached hereto as Exhibit B is a proposed revised scheduling order.

We thank the Court for its time and consideration.

Respectfully Submitted,

Levine Lee LLP

s/ Seth L. Levine

Seth L. Levine

cc: All parties (via ECF)